

ORIGINAL

BELLSOUTH

BellSouth
Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

February 14, 2000

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

EX PARTE OR LATE FILED

RECEIVED
FEB 14 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

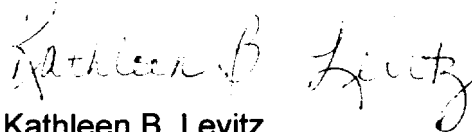
Re: Written Ex Parte in CC Docket No. 98-121
and CC Docket No. 99-295

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Claudia Fox, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division, with copies of that ex parte going also to William Agee and Jake Jennings. That ex parte consists of a copies of Exceptions that KPMG filed with the Georgia Public Service Commission on January 13, 2000, and February 2, 2000, in connection with its execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. Included with each of those filings is BellSouth's response to each of the exceptions KPMG raised in that filing.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, we are filing two copies of this notice and that written ex parte presentation in the docket identified above. Please associate this notification with the record in that proceeding.

Sincerely,


Kathleen B. Levitz

Attachment

cc: Claudia Fox (w/o attachment)
William Agee (w/o attachment)
Jake Jennings (w/o attachment)

BellSouth
Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

February 14, 2000

WRITTEN EX PARTE

Ms. Claudia Fox
Policy and Program Planning Division
Common Carrier Bureau
Room 5-C235
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, D.C. 20554

Re: CC Docket No. 98-121 and CC Docket No. 99-295

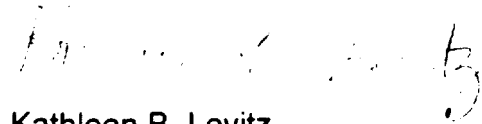
Dear Ms. Fox:

Attached are copies of KPMG Exceptions 5 through 8 arising during KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. Exceptions 5 and 6, as well as BellSouth's response to each, were filed with the Georgia Public Service Commission on January 13, 2000. Exceptions 7 and 8 and BellSouth's response to those exceptions were filed with that Commission on February 2, 2000. I am sending these filings to you in response to your request that BellSouth share with you any status reports prepared by KPMG as part of the third party testing program currently underway in Georgia. If you have any questions after reviewing the report, please call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am filing two copies of this written ex parte presentation with the Secretary of the Commission

and requesting that it be associated with the record in the docket identified above.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kathleen B. Levitz", with a stylized flourish at the end.

Kathleen B. Levitz

Attachment

cc: William Agee
Jake Jennings



303 Peachtree Street, N.E.
Suite 2000
Atlanta, GA 30308

Telephone 404 222 3000
Fax 404 222 3050

RECEIVED

JAN 13 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

January 13, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

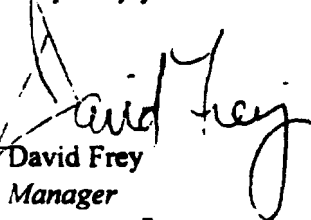
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's Exceptions 5 and 6 with BellSouth's responses for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record



KPMG LLP, KPMG LLP & COMPANY, INC. AND KPMG LLP, KPMG LLP & COMPANY, INC. ARE A PART OF THE KPMG NETWORK OF MEMBER FIRMS OF THE KPMG NETWORK.



EXCEPTION 5

BellSouth Georgia OSS Testing Evaluation

RECEIVED

JAN 13 2000

EXECUTIVE SECRETARY
G.P.S.C.

Date: December 29, 1999

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Documentation Evaluations (O&P-8 and O&P-9) and the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth's rules for submitting supplements to existing service orders are not accurately defined.

A supplement is defined as a new version of an existing service order. CLECs issue supplements to service requests under several circumstances:

- To cancel a pending service order.
- To request a new desired due date.
- To change other aspects of an existing service order (e.g., to correct errors, to reflect changes in an end user's service request).

Documented Supplemental Service Request Process

Rules for generating supplemental service requests are provided in BellSouth's *Local Exchange Ordering (LEO) Guide, Volume 1*. An entry in the SUP data element is required when issuing a new version to a service order. As documented in Issue 7L of the LEO Guide, the following conditions apply to populating the SUP field:

Note 1: Prohibited on initial request.

Note 2: Prohibited when changing activity entry in the ACT field.

Note 3: Prohibited when changing a Service Type that results in a change to the first character of the REQ TYP field.

Note 4: When issuing a SUP, the same PON number on the original LSR should be used, however the VER must be different.

System Functionality

KPMG has received multiple errors as a result of supplemental service orders submitted via BellSouth's TAG and EDI interfaces. Investigation of these error messages indicated that two specific fields could not be changed when issuing a supplemental order.



EXCEPTION 5

BellSouth Georgia OSS Testing Evaluation

1. Company Code (CC)

KPMG issued several supplements in order to make a correction to the CC data element. KPMG received Hard Errors (Reject Code 1023) in each instance. The error message indicated that "No original LSR found for this Sup". After referring these errors to the BellSouth Local Carrier Service Center (LCSC), KPMG was informed that the Company Code data element could not be changed on a supplement and was requested to submit a new service request.

The LEO Guide rules for populating the CC field contain no reference to this system requirement. As a result of the requirement, a CLEC making an error in populating the CC field on an initial order cannot correct the order via the SUP process.

2. Local Billing Account Number (LOCBAN)

During validity testing of Local Number Portability (LNP) orders, KPMG issued a supplement in order to make a correction to the LOCBAN data element. KPMG received a Hard Error in response to this supplement. The error indicated "Invalid LOCBAN change on Sup". The BellSouth LNP test coordinator informed KPMG that this field cannot be changed on a supplemental service order.

The LEO Guide rules for populating the LOCBAN field contain no reference to this system requirement.

Impact

Deficiencies in the documented process for issuing supplemental service requests impact a CLEC's ability to perform normal business operations with BellSouth. The rules for changing specific data elements on a service order supplement are not adequately documented and could lead to unnecessary errors. For these undocumented instances where a field may not be altered on a supplement, the resulting system restrictions necessitate the issuance of a new service order.

Examples of how CLEC operations could be affected include:

- Workforce management disruptions and higher operating costs resulting from allocation of CLEC personnel to issue corrected service orders.
- Reductions in customer satisfaction due to an inability to quickly fulfill local service order requests.



January 7, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Documentation Evaluations (O&P-8 and O&P-9) and the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth's rules for submitting supplements to existing service orders are not accurately defined.

A supplement is defined as a new version of an existing service order. CLECs issue supplements to service requests under several circumstances:

- To cancel a pending service order.
- To request a new desired due date.
- To change other aspects of an existing service order (e.g., to correct errors, to reflect changes in an end user's service request).

Documented Supplemental Service Request Process

Rules for generating supplemental service requests are provided in BellSouth's *Local Exchange Ordering (LEO) Guide, Volume 1*. An entry in the SUP data element is required when issuing a new version to a service order. As documented in Issue 7L of the LEO Guide, the following conditions apply to populating the SUP field:

Note 1: Prohibited on initial request.

Note 2: Prohibited when changing activity entry in the ACT field.

Note 3: Prohibited when changing a Service Type that results in a change to the first character of the REQTYP field.

Note 4: When issuing a SUP, the same PON number on the original LSR should be used, however the VER must be different.

System Functionality

KPMG has received multiple errors as a result of supplemental service orders submitted via BellSouth's TAG and EDI interfaces. Investigation of these error messages indicated that two specific fields could not be changed when issuing a supplemental order.

1. Company Code (CC)

KPMG issued several supplements in order to make a correction to the CC data element. KPMG received Hard Errors (Reject Code 1023) in each instance. The error message indicated that "No original LSR found for this Sup". After referring these errors to the BellSouth Local Carrier Service Center (LCSC), KPMG was informed that the Company Code data element could not be changed on a supplement and was requested to submit a new service request.

The LEO Guide rules for populating the CC field contain no reference to this system requirement. As a result of the requirement, a CLEC making an error in populating the CC field on an initial order cannot correct the order via the SUP process.

2. Local Billing Account Number (LOCBAN)

During validity testing of Local Number Portability (LNP) orders, KPMG issued a supplement in order to make a correction to the LOCBAN data element. KPMG received a Hard Error in response to this supplement. The error indicated "Invalid LOCBAN change on Sup". The BellSouth LNP test coordinator informed KPMG that this field cannot be changed on a supplemental service order.

The LEO Guide rules for populating the LOCBAN field contain no reference to this system requirement.

Impact

Deficiencies in the documented process for issuing supplemental service requests impact a CLEC's ability to perform normal business operations with BellSouth. The rules for changing specific data elements on a service order supplement are not adequately documented and could lead to unnecessary errors. For these undocumented instances where a field may not be altered on a supplement, the resulting system restrictions necessitate the issuance of a new service order.

Examples of how CLEC operations could be affected include:

- Workforce management disruptions and higher operating costs resulting from allocation of CLEC personnel to issue corrected service orders.

Reductions in customer satisfaction due to an inability to quickly fulfill local service order requests.

BST Response

The Local Exchange Ordering Implementation Guide, LEO-IG, will be updated to define fields that cannot be changed via a Supplement. The date for posting to the web is January 31, 2000.



EXCEPTION 6

BellSouth Georgia OSS Testing Evaluation

Date: December 29, 1999

EXCEPTION REPORT

An exception has been identified as a result of the Maintenance & Repair 8: TAFI Documentation Evaluation (M&R-8).

Exception:

Multiple instances of inaccuracies in TAFI documentation and deficiencies in distribution of updates have been identified.

KPMG has noted the following defects in TAFI documentation and change notification methods:

1. While there are methods in place to distribute TAFI release change updates internally at BellSouth, CLECs do not receive the same information. Each time BellSouth implements major or minor version changes to the TAFI interface, a packet of information regarding these changes is created and distributed within BellSouth at least one to two weeks prior to the implementation of the changes. This information is also posted on the BellSouth Intranet site. CLECs do not have access to this Intranet site, and, therefore, cannot obtain the change information.
2. The *CLEC TAFI End-User Training and User Guide* Issue 6, September 1998 is written for software version R97.5.4, yet the current software version is R99.6.
3. The *CLEC TAFI End-User Training and User Guide* Issue 6, September 1998 is inconsistent across media formats. The *CLEC TAFI End-User Training and User Guide* that BellSouth provided to KPMG in TAFI training is labeled Issue 6, September 1998. The online version of the *CLEC TAFI End-User Training and User Guide* is also labeled Issue 6, September 1998. However, change and revision inconsistencies between the two guides exist. In addition, errors are present in the online version. Examples of differences and errors identified by KPMG include:
 - The revision history in the online version contains additional revisions that are not present in the hard copy version.
 - The revision history in the online version does not reflect all revisions that have been made. For example, the section numbering has been changed, but is not documented.
 - The "Setting Up Dials" section has been removed from the online version.
 - The section numbering has been changed in the online version.
 - Page references in the online version are incorrect due to changes made in the document. For example, page 192 has a reference to page 132, yet the referenced information is not located on page 132.

KPMG LLP
01/13/00
Page 1 of 2



EXCEPTION 6

BellSouth Georgia OSS Testing Evaluation

- Typographical errors have been introduced into the online version. Examples include:
 - On page 40 of the online version, a portion of the paragraph discussing the Status Line has been inserted into the paragraph discussing Title Bar. This differs from page 38 of the hard copy.
 - On page 67 of the online version, a paragraph at the bottom of the page is repeated at the top of page 68.
- Formatting changes have been made throughout the online version. Examples include:
 - The note format on pages 15, 19, 20, and 27 of the online version differs from the format on pages 10, 15, 16, and 25 of the hard copy.
 - The list of behind the scene systems has been re-formatted on page 17 of the online version, and differs from the list on page 13 of the hard copy.
 - The list of elements on the Trouble Entry screen on page 51 of the online version has been reformatted, and differs from page 53 of the hard copy.

Impact

The impacts of these errors in TAFI documentation and defects in change update procedures affect the efficiency and effectiveness of CLEC M&R operations. Specifically:

- Without notification of changes by BellSouth and the receipt of accurate documentation, CLECs encounter changes for the first time when they connect to the TAFI interface and see a new window, message, or field. While some changes can be intuitive (such as new flows), others require instruction, such as the multiple trouble report. Without updated information, a CLEC may not know how to utilize a changed function in TAFI, and may thus be required to call in the report. In addition, it may take several attempts of trial and error to use a new function or feature, causing a decrease in productivity and customer service, and an increase in CLEC trouble processing costs. Finally, without adequate instruction, CLECs may not have the ability to use TAFI's full range of capabilities in parity with BellSouth personnel.
- In the absence of properly noted changes to TAFI documentation, a CLEC may attempt to use an inaccurate version. A CLEC that assumes that differences between the online user guide and their own version are noted may reprint only the chapter with changes noted and insert it into their manual. Conversely, a CLEC that prints the entire online manual would then be using a manual that contains new errors. Both cases result in inaccurate user documentation, which can increase errors, reduce efficiency, and add cost to CLEC operations.



January 7, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Maintenance & Repair 8: TAFI Documentation Evaluation (M&R-8).

Exception:

Multiple instances of inaccuracies in TAFI documentation and deficiencies in distribution of updates have been identified.

KPMG has noted the following defects in TAFI documentation and change notification methods:

1. While there are methods in place to distribute TAFI release change updates internally at BellSouth, CLECs do not receive the same information. Each time BellSouth implements major or minor version changes to the TAFI interface, a packet of information regarding these changes is created and distributed within BellSouth at least one to two weeks prior to the implementation of the changes. This information is also posted on the BellSouth Intranet site. CLECs do not have access to this Intranet site, and, therefore, cannot obtain the change information.
2. The *CLEC TAFI End-User Training and User Guide* Issue 6, September 1998 is written for software version R97.5.4, yet the current software version is R99.6.
3. The *CLEC TAFI End-User Training and User Guide* Issue 6, September 1998 is inconsistent across media formats. The *CLEC TAFI End-User Training and User Guide* that BellSouth provided to KPMG in TAFI training is labeled Issue 6, September 1998. The online version of the *CLEC TAFI End-User Training and User Guide* is also labeled Issue 6, September 1998. However, change and revision inconsistencies between the two guides exist. In addition, errors are present in the online version. Examples of differences and errors identified by KPMG include:
 - The revision history in the online version contains additional revisions that are not present in the hard copy version.
 - The revision history in the online version does not reflect all revisions that have been made. For example, the section numbering has been changed, but is not documented.
 - The "Setting Up Dials" section has been removed from the online version.
 - The section numbering has been changed in the online version.
 - Page references in the online version are incorrect due to changes made in the document. For example, page 192 has a reference to page 132, yet the referenced information is not located on page 132.
 - Typographical errors have been introduced into the online version. Examples include:
 - On page 40 of the online version, a portion of the paragraph discussing the Status Line has been inserted into the paragraph discussing Title Bar. This differs from page 38 of the hard copy.
 - On page 67 of the online version, a paragraph at the bottom of the page is repeated at the top of page 68.
 - Formatting changes have been made throughout the online version.

Examples include:

- The note format on pages 15, 19, 20, and 27 of the online version differs from the format on pages 10, 15, 16, and 25 of the hard copy.
- The list of behind the scene systems has been re-formatted on page 17 of the online version, and differs from the list on page 13 of the hard copy.
- The list of elements on the Trouble Entry screen on page 51 of the online version has been reformatted, and differs from page 53 of the hard copy.

Impact

The impacts of these errors in TAFI documentation and defects in change update procedures affect the efficiency and effectiveness of CLEC M&R operations. Specifically:

- Without notification of changes by BellSouth and the receipt of accurate documentation, CLECs encounter changes for the first time when they connect to the TAFI interface and see a new window, message, or field. While some changes can be intuitive (such as new flows), others require instruction, such as the multiple trouble report. Without updated information, a CLEC may not know how to utilize a changed function in TAFI, and may thus be required to call in the report. In addition, it may take several attempts of trial and error to use a new function or feature, causing a decrease in productivity and customer service, and an increase in CLEC trouble processing costs. Finally, without adequate instruction, CLECs may not have the ability to use TAFI's full range of capabilities in parity with BellSouth personnel.

In the absence of properly noted changes to TAFI documentation, a CLEC may attempt to use an inaccurate version. A CLEC that assumes that differences between the online user guide and their own version are noted may reprint only the chapter with changes noted and insert it into their manual. Conversely, a CLEC that prints the entire online manual would then be using a manual that contains new errors. Both cases result in inaccurate user documentation, which can increase errors, reduce

BellSouth Response

The CLEC TAFI End-User Training and User Guide was developed as the training vehicle to teach CLEC users on how to use the system. Once exposed to this material, the user understands the interactive nature of TAFI and becomes comfortable with its use (i.e., select a menu option, TAFI prompts for information, the user provides the information and then TAFI generates a recommended course of action.). This interactive nature has been maintained for all system enhancements and therefore the user automatically benefits.

We acknowledge the current document is outdated and will update by February 1, 2000. We will ensure that page references, page formats, section numbering, revision history, etc. are consistent between the on-line and hard copy documents. We will also exercise additional care to ensure the accuracy of future document revisions which will resolve the problem with typographical errors.

We will re-enforce that changes to TAFI documentation follow the existing CLEC notification process to allow more timely notification of CLEC impacting changes.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

Newton M. Galloway
Newton Galloway & Associates
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229

Charles A. Hudak, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Kent Heyman, General Counsel
MGC Communications
3301 N. Buffalo Drive
Las Vegas, NV 89129

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

John M. Stuckey, Jr.
Terri M. Lyndall
Webb, Stuckey & Lindsey
Harris Tower, Peachtree Center
7 Lenox Pointe, N.E.
Atlanta, GA 30324

Charles V. Gerkin, Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Frank B. Strickland
Wilson, Strickland & Benson
One Midtown Plaza, Suite 1100
1360 Peachtree Street, NE
Atlanta, GA 30309

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Peyton S. Hawes Jr.
127 Peachtree Street, NE
Suite 1100
Atlanta, GA 30303-1810

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1615 M Street, N.W.
Suite 700
Washington, DC 20036

James G. Harralson
BellSouth Long Distance
32 Perimeter Center East
Atlanta, GA 30346

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216

Judith A. Holiber
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105

Laureen McGurk Seeger
Morris, Manning & Martin
1600 Atlanta Financial Center
3343 Peachtree Road, NE
Atlanta, GA 30326-1044

Daniel Walsh
Assistant Attorney General
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

Cecil L. Davis Jr.
NEXTLINK Georgia, Inc.
4000 Highlands Parkway
Smyrna, GA 30082

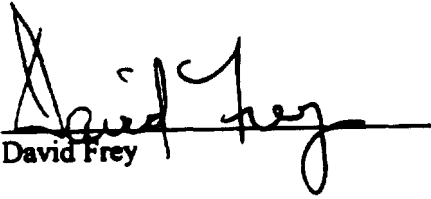
John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. Box 13961
Durham, NC 27709-3961

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

Fred McCallum, Jr.
125 Perimeter Center West
Room 376
Atlanta, GA 30346

— This 13th day of January 2000.


David Frey

KPMG
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000



303 Peachtree Street, N.E.
Suite 2000
Atlanta, GA 30308

Telephone 404 222 3000
Fax 404 222 3050

2/2
19/6

February 2, 2000

RECEIVED

FEB 02 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

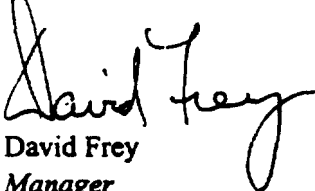
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's Exceptions 7 and 8 with BellSouth's responses for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,



David Frey
Manager

Enclosures

cc: Parties of Record



KPMG LLP, KPMG LLP & U.S. member, advisory partnership is
a member of a PwC international, a Swiss association



EXCEPTION 7

BellSouth Georgia OSS Testing Evaluation

Date: January 5, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Functional Test (M&R-2). This exception is described below.

Exception:

The BellSouth ECTA Gateway does not allow CLECs to process trouble reports for SL1 circuits.

BellSouth's ECTA Gateway is designed to allow CLECs to process trouble reports for all designed and non-designed circuits, including SL1 UNEs. The ECTA Gateway routes all trouble tickets to one of two maintenance and repair (M&R) management systems, WFA (for designed circuits) and LMOS (for non-designed circuits). KPMG functional transaction testing identified a defect with ECTA: Entering a trouble report into ECTA for an SL1 circuit generates an error response from the ECTA Gateway, and no trouble ticket is created in either the LMOS or the WFA systems.

Impact

Without the ability to use ECTA to enter a trouble report for an SL1 circuit, a CLEC must call BellSouth in order to report a trouble instance. A trouble report via telephone is neither recorded in, nor accessible through, ECTA. A CLEC, therefore, must use alternative reporting and tracking methods. This decreased functionality can result in slower response intervals, decreased customer satisfaction, and the need for changes in workforce management.



January 19, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Functional Test (M&R-2). This exception is described below.

Exception:

The BellSouth ECTA Gateway does not allow CLECs to process trouble reports for SL1 circuits.

BellSouth's ECTA Gateway is designed to allow CLECs to process trouble reports for all designed and non-designed circuits, including SL1 UNEs. The ECTA Gateway routes all trouble tickets to one of two maintenance and repair (M&R) management systems, WFA (for designed circuits) and LMOS (for non-designed circuits). KPMG functional transaction testing identified a defect with ECTA: Entering a trouble report into ECTA for an SL1 circuit generates an error response from the ECTA Gateway, and no trouble ticket is created in either the LMOS or the WFA systems.

Impact

Without the ability to use ECTA to enter a trouble report for an SL1 circuit, a CLEC must call BellSouth in order to report a trouble instance. A trouble report via telephone is neither recorded in, nor accessible through, ECTA. A CLEC, therefore, must use alternative reporting and tracking methods. This decreased functionality can result in slower response intervals, decreased customer satisfaction, and the need for changes in workforce management.

BST Response

An internal problem with properly processing SL1 reports was corrected on January 6, 2000. SL1 UNE reports have been successfully submitted since the problem was corrected.



EXCEPTION 8

BellSouth Georgia OSS Evaluation

Date: January 12, 2000

EXCEPTION REPORT

An exception has been identified in the electronic order flow process for provisioning of Unbundled Network Elements as a result of the EDI and TAG Functional Test (O&P-1 and O&P-2) and the Provisioning Verification Test (O&P-5).

Exception:

Firm Order Confirmations (FOCs) are issued by BellSouth on CLEC service orders before facility status has been determined.

Through interviews with BellSouth personnel and review of BellSouth documentation, KPMG has discovered that BellSouth issues FOCs on CLEC service orders before facility availability is confirmed. After receiving a valid service order from a CLEC, BellSouth issues a FOC which includes a committed service date. Subsequent to a FOC's issuance, BellSouth's Loop Facilities Assignment Control System (LFACS) attempts to assign a facility to the service order. If the necessary facility is deemed non-available, a PF (Pending Facility) status¹ is issued on a service order and the CLEC is notified of the service order's changed status².

During the course of testing, KPMG received a electronic PF status on December 23, 1999 (FOC had been received on 12/20/99) for PON # 305A112PEH100003. The PF notification was unable to provide an estimated service date.

Impact

Receipt of PF status subsequent to FOC issuance will impact CLECs in the following ways:

- **Customer Satisfaction:** Receipt of an FOC would likely lead a CLEC to immediately notify a customer of a pending service installation on the date specified in the FOC. After notifying the customer, a CLEC could receive a PF notification, indicating that the appropriate facilities are not in place to provision the required service. The CLEC will then have to contact the customer again to explain that service provisioning will be delayed from the original date. Such action will negatively affect CLEC customer satisfaction.

¹ Pending Facility status is issued to service orders where no facility is available for provisioning.

² According to the BellSouth Facility Based Advisory Guide Issue 4.1 - October 22, 1999, Section 4g: H. Firm Order Confirmation, "If there is a post-FOC facility problem, the CLEC will be informed of the estimated service date."



EXCEPTION 8

BellSouth Georgia OSS Evaluation

-
- **Operational Costs:** CLEC will incur resource costs associated with delaying, rescheduling or canceling internal processes related to provisioning services to an end-user customer.



January 18, 2000

EXCEPTION REPORT

An exception has been identified in the electronic order flow process for provisioning of Unbundled Network Elements as a result of the EDI and TAG Functional Test (O&P-1 and O&P-2) and the Provisioning Verification Test (O&P-5).

Exception:

Firm Order Confirmations (FOCs) are issued by BellSouth on CLEC service orders before facility status has been determined.

Through interviews with BellSouth personnel and review of BellSouth documentation, KPMG has discovered that BellSouth issues FOCs on CLEC service orders before facility availability is confirmed. After receiving a valid service order from a CLEC, BellSouth issues a FOC which includes a committed service date. Subsequent to a FOC's issuance, BellSouth's Loop Facilities Assignment Control System (LFACS) attempts to assign a facility to the service order. If the necessary facility is deemed non-available, a PF (Pending Facility) status¹ is issued on a service order and the CLEC is notified of the service order's changed status².

During the course of testing, KPMG received a electronic PF status on December 23, 1999 (FOC had been received on 12/20/99) for PON # 305A112PEH100003. The PF notification was unable to provide an estimated service date.

¹ Pending Facility status is issued to service orders where no facility is available for provisioning.

² According to the BellSouth Facility Based Advisory Guide Issue 4.1 - October 22, 1999, Section 4g: H. Firm Order Confirmation, "If there is a post-FOC facility problem, the CLEC will be informed of the estimated service date."

¹ Pending Facility status is issued to service orders where no facility is available for provisioning.

² According to the BellSouth Facility Based Advisory Guide Issue 4.1 - October 22, 1999, Section 4g: H. Firm Order Confirmation, "If there is a post-FOC facility problem, the CLEC will be informed of the estimated service date."

Impact

Receipt of PF status subsequent to FOC issuance will impact CLECs in the following ways:

- **Customer Satisfaction:** Receipt of an FOC would likely lead a CLEC to immediately notify a customer of a pending service installation on the date specified in the FOC. After notifying the customer, a CLEC could receive a PF notification, indicating that the appropriate facilities are not in place to provision the required service. The CLEC will then have to contact the customer again to explain that service provisioning will be delayed from the original date. Such action will negatively affect CLEC customer satisfaction.
- **Operational Costs:** CLEC will incur resource costs associated with delaying, rescheduling or canceling internal processes related to provisioning services to an end-user customer.

BST Response

BellSouth is providing parity of service to retail and CLEC customers. A Firm Order Confirmation, FOC, is returned to the CLEC when an error free service order is generated. A firm due date is provided to retail customers when an error free service order is submitted to the Service Order Communications System, SOCS. If a jeopardy condition arises for a CLEC, a Jeopardy Notice is sent to the CLEC. If a jeopardy condition arises for a retail customer, the retail service representative attempts to contact the customer to inform them of the jeopardy condition. The electronic notification given to the CLEC assures that the CLEC is notified. Manual calls to retail customers do not have as high of a success rate for notification; thus BellSouth is providing favorable notification service to the CLEC.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

Newton M. Galloway
Newton Galloway & Associates
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229

Charles A. Hudak, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Kent Heyman, General Counsel
MGC Communications
3301 N. Buffalo Drive
Las Vegas, NV 89129

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

John M. Stuckey, Jr.
Terri M. Lyndall
Webb, Stuckey & Lindsey
Harris Tower, Peachtree Center
7 Lenox Pointe, N.E.
Atlanta, GA 30324

Charles V. Gerkin, Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Frank B. Strickland
Wilson, Strickland & Benson
One Midtown Plaza, Suite 1100
1360 Peachtree Street, NE
Atlanta, GA 30309

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

James G. Harralson
BellSouth Long Distance
32 Perimeter Center East
Atlanta, GA 30346

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346

Judith A. Holiber
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Laureen McGurk Seeger
Morris, Manning & Martin
1600 Atlanta Financial Center
3343 Peachtree Road, NE
Atlanta, GA 30326-1044

Peyton S. Hawes Jr.
127 Peachtree Street, NE
Suite 1100
Atlanta, GA 30303-1810

Daniel Walsh
Assistant Attorney General
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071

Cecil L. Davis Jr.
NEXTLINK Georgia, Inc.
4000 Highlands Parkway
Smyrna, GA 30082

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Ave, N.W.
Suite 300
Washington, DC 20036

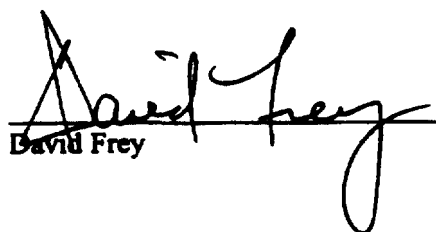
John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. Box 13961
Durham, NC 27709-3961

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

Fred McCallum, Jr.
125 Perimeter Center West
Room 376
Atlanta, GA 30346

This 2nd day of February 2000.


David Frey

KPMG
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000